

Wallace Community College Code of Conduct for Private Student Loans

In accordance with 34 C.F.R. §668.14(b) (27) Wallace Community College (WCC) hereby establishes the following Code of Conduct regarding private student loans¹.

The responsibility for the administration of this Code of Conduct and its enforcement resides with the President of Wallace Community College. This code of conduct is applicable to all officers, employees and agents of the WCC and any affiliated organizations with responsibilities (directly or indirectly) with respect to private student loans. College employees and agents subject to this policy are **prohibited** from doing any of the following, either on their own behalf or on behalf of the College:

- Participating in a revenue-sharing arrangement with any lender by which the lender pays a fee or provides other material benefits to the College or any employee or agent subject to this policy in exchange for the College's recommendation of that lender or its loan products;
- Soliciting or accepting gifts, including reimbursement of expenses or payment of expenses of a value greater than that set forth in the *Code of Alabama, Title 36, Public Officers and Employees, Chapter 25, Code of Ethics for Public Officials, Employees, Etc.* from any lender, guarantor, or servicer that provides private education loans to students, unless the item or payment in question meets the exceptions set forth in 34 C.F.R. § 601.21(c)(2)(iii);
- Accepting from any lender or affiliate any fee, payment, or other financial benefit as compensation for any consulting arrangement or other services contract with or on behalf of a lender of private education loans, except that College employees, or agents subject to this policy who do *not* work in the Office of Financial Aid may serve on a lender's board of directors, provided that they recuse themselves from any board decisions relating to private education loans at the College;
- Directing borrowers to particular lenders or delaying loan certifications;
- Requesting or accepting from any lender any offer of funds to be used for private education loans in exchange for the College providing the lender with a specified loan volume or preferred lender arrangement for private education loans;
- Requesting or accepting any lender's request for assistance with a call center or Office of Financial Aid staffing, except that the College may request or accept from any lender professional development training for financial aid staff members, educational counseling or other materials to provide to the College's student borrowers (provided that such materials indicate the lender's involvement in preparing or providing them); and
- Receiving anything of value from any lender, other than reimbursement for reasonable expenses, in exchange for service on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors.

Any employee who is offered any gift or monetary compensation from a lender should contact the Office of Financial Aid for clarification and guidance before responding favorably to that offer. Should an employee subject to this policy inadvertently accept a gift or other type of monetary compensation from a lender, that employee must immediately notify the Director of Financial Aid. The amount received, the name of the employee or agent, a brief description of the activity and the dates of the activity for which the expenses were paid or provided must be reported. The Director of Financial Aid is responsible for reporting this information annually to the Secretary of the Department of Education. The Director of Financial Aid is responsible for notifying all employees and agents of this requirement annually. This notification will be done via email in January of each year. In addition, this code of conduct will be published on the website of the Office of Financial Aid.

¹ This regulation requires all institutions that participate in the federal Title IV student loan programs to adopt a code of conduct that meets the requirements of 34 C.F.R. § 601.21. As Wallace Community College does not participate in the federal student loan program, the regulation cited applies to the College as its terms relating to private education loans. A list of private education loan lenders frequently used by WCC students may be found on the Web site of the Office of Financial Aid at http://www.wallace.edu/enrollment/financial_aid.htm. This is not an exhaustive list, as lenders for private education loans change frequently.